## RECEIVED DIV SOLID WASTE MGT



DEC 1 9 2000

Group No	File	No
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#### STATE OF TENNESSEE

## DEPARTMENT OF ENVIRONMENT AND CONSERVATION JACKSON ENVIRONMENTAL ASSISTANCE CENTER DIVISION OF SOLID WAYER MANAGEMENT

362 CARRIAGE HOUSE DRIVE JACKSON, TENNESSEE 38305-2222

December 15, 2000

CERTIFIED MAIL Z 531 590 079

Ms. Carol Williams
Environmental, Safety, Quality Engineer
A.O. Smith Electrical Products Company
669A Natchez Trace Drive
Lexington, TN 38351

**RE: NOTICE OF VIOLATION** 

ID #: TND 06-164-7194 Henderson County

Dear Ms. Williams:

This letter confirms observations made by the Division of Solid Waste Management personnel during a compliance evaluation inspection at A.O. Smith in Lexington, TN. The inspection was conducted on **December 8, 2000.** 

The enclosed report outlines the violations identified during the inspection. Corrective measures must be implemented that address these violations, so a follow-up inspection will be necessary to verify that appropriate measures have been taken.

I appreciate the courtesy extended to the inspection team during our visit to your facility and if you have any questions concerning this correspondence, please contact me at (901) 512-1371 or James (Pete) Kelly at (901) 512-1341.

Sincerely,

Douglas Wright

Environmental Protection Specialist Division of Solid Waste Management

cc: DSWM, NCO, R. Cable DSWM, EAC-J file

## **HAZARDOUS WASTE INSPECTION REPORT**

#### **SITE/PHYSICAL LOCATION:**

A.O. Smith Electrical Products Company ID #: TND 06-164-7194
669A Natchez Trace Drive Lexington, TN 38351
Henderson County

#### **PRIMARY CONTACT(S):**

Ms. Carol Williams, Environmental, Safety, Quality Engineer A.O. Smith Electrical Products Company 669A Natchez Trace Drive Lexington, TN 38351 Phone: (901)-967-4709

Email: cwilliams@aosmith.com

#### **DATE/TIME OF INSPECTION:**

December 8, 2000 beginning at 10:30 a.m.

### **INSPECTION PARTICIPANTS:**

Carol Williams, Environmental, Safety, Quality Engineer, A.O. Smith Doug Wright, DSWM, Jackson Environmental Assistance Center

## REPORT PREPARED BY:

Douglas Wright
Division of Solid Waste Management, TDEC
Jackson Environmental Assistance Center
Phone: (901)-512-1371

Email: dwright4@mail.state.tn.us

## **PURPOSE OF INSPECTION:**

This inspection was conducted to evaluate A.O. Smith's compliance with the applicable requirements of the Rules and Regulations promulgated pursuant to the <u>Hazardous Waste Management Act</u>, T.C.A., 68-212-101 et seq. and <u>Hazardous Waste Reduction Act</u>, T.C.A. 68-212-301 et seq.

#### **FACILITY DESCRIPTION:**

A.O. Smith (Smith) is located on the west side of Natchez Trace Drive in Lexington, in Henderson County. This plant makes electric motors under SIC code 3621. The A.O. Smith facility is a division of A.O. Smith Corporation, and it was owned and operated as MagneTek before April 1999. It shares a building at 669 Natchez Trace Drive with Leroy Somer, employs approximately 60 people, and shares other employees with Leroy Somer.

The normal hazardous wastes at this facility consist of paint, solvent wastes, and off specification varnish. Used oil is also produced here.

#### **INSPECTION FINDINGS:**

Based on notification data submitted to the DSWM, Smith is a Small Quantity Generator (SQG) of hazardous waste, but the facility is expecting to file by next March as a Large Quantity Generator. "Drums" refers here to 55-gallon drums unless otherwise specified. Bold print is provided for items of primary importance, rule citations, and specific observations noted.

The inspector, upon being received by Ms. Williams, explained that the purpose of the visit was to initiate a Compliance Evaluation Inspection of the records relating to hazardous waste, the used oil storage area, and the hazardous waste storage and generation areas.

The inspection began with a review of **records** relating to hazardous and solid wastes. These records included: shipping manifests with Land Disposal Restriction forms, used oil shipping records, training records, and waste minimization plan. No deficiencies were noted in these records. Leroy Somer handles fluorescent lights, special wastes, and used oil for AO Smith because Leroy Somer is in the same building and also has approximately the same waste streams.

H & H picks up about 3000 gallons of used oil per month according to manifests supplied by Leroy Somer, and the last pickup was 11-17-00. Ms. Williams had hazardous waste training last December. AO Smith was operating as a large quantity generator March of 2000, and the accumulation area was inspected at least weekly during that time.

The annual report was examined next. The MagneTek, Inc. property at 669A Natchez Trace Drive changed ownership to A.O. Smith Electrical Products Company in 1999. Tables One and Two provide information from the annual report, while Table Three provides background information on the same property before the name and ownership changes.

### **INSPECTION FINDINGS:** (cont'd)

Table One: 1999 Transporters and TSDR's

Transporter #	Transporter Name	TSDR #	TSDR Name
GAD981269095	MCF Systems	ALD981020894	Fisher Industrial Services,
	Atlanta		Inc, Glencoe, AL

Table Two: A.O. Smith Waste Streams and Offsite Shipping in 1999

Stream Number	Source	Waste Codes	Amount Handled (kgs)
12	Waste Varnish	D001	5781
13	Waste Acetone	F003, F005, D001	1000
14	Waste Flam Liquid NOS	F003, F005, D001	1800
16	Scrap Paint	D001	600

Table Three: MagneTek, Inc. Reported Waste Streams and Offsite Shipping in 1998

Stream Number	Source	Waste Codes	Amount Shipped (kgs)
12	Waste Varnish	D001, F003	5539
13	Waste Acetone	F003, F005, D001	1596
14	Waste Flam Liquid NOS	F003, F005, D001	1347

The hazardous waste accumulation area was inspected after the record review. The emergency equipment was in nearby stalls and included: a working telephone; up to date emergency contact list; fire extinguisher; and spill kit with yellow over pack drums. The area was located in a padlocked stall approximately 50 yards from the manufacturing buildings. The accumulation area was empty.

During the plant tour, we visited the hazardous waste point of generation, or satellite, areas. There were four of these areas: one each near the three paint booths, and one drum in a central location near all three booths. The three paint booth satellite areas each consisted of a small, red, flip top container or a bucket located near the paint booths. One of the three paint booths is only operated periodically and was not in use at the time of the inspection. The buckets near the two operating paint booths were open, unlabeled, and about half full of gray-blue waste paint. The centrally located drum of paint waste was properly labeled and closed. The smaller containers at the satellite areas are consolidated into the centrally located drum when the smaller containers are full of either waste paint or used solvent.

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#### **INSPECTION FINDINGS:** (cont'd)

Paint gun cleanup generates Waste Streams #13 and #14 identified above in Table 1. Waste Stream #12 does not require a satellite area because it is only generated periodically during varnish tank clean up or when new varnish is accidentally contaminated. Waste varnish is typically produced in solid chips that are disposed of as a special waste with the varnish chips from Leroy Somer.

In closing the inspection, Ms. Williams was informed that violations were noted and a Notice of Violation/Inspection Report would soon be issued. The violations are enumerated in the following section.

#### **VIOLATIONS:**

There were two observations noted from the walk through part of the inspection. The applicable rule will first be quoted in part or in full as relates to the observation, then the observation will be named.

#### Citation #1:

1200-1-11-.03(4)(e)5.(i) states: A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste listed in Rule 1200-1-11-.02(4)(b),(c), or (d)5, in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with part 2 of this subparagraph provided he:

(I)Complies with Rule 1200-1-11-.05(9)(b),(c), and (d) 1;

Rule 1200-1-11-.05(9)(d) 1 states:

A container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

Observation #1: The satellite area buckets near two of the three hazardous waste paint booths were open when not in use.

#### Citation #2:

1200-1-11-.03(4)(e)5.(i) states: A generator may accumulate as much as 55 gallons of hazardous waste or one quart of acute hazardous waste listed in Rule 1200-1-11-.02(4)(b),(c), or (d)5, in containers at or near any point of generation where wastes initially accumulate, which is under the control of the operator of the process generating the waste, without a permit or interim status and without complying with part 2 of this subparagraph provided he...

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## **<u>VIOLATIONS</u>**: (continued)

(II) Marks his containers either with the words "Hazardous Waste" or with other words that identify the contents of the containers.

Observation #2: The satellite area buckets near two of the three hazardous waste paint booths were not properly labeled.

SIGNED: Douglas Wright, TDEC, DSWM	DATE: /2 -/5-00
REVIEWED: James (Pete) Kelly, TDEC, DSWM	DATE: <u>/2-/5-60</u>

PROGRAM: Hazardous Waste

# State of Tennessee Division of Solid Waste Management Inspection and Compliance Sheet

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RAC

a ! 500°	39-002 TND061647194-2000128-8529		Date Received for Processing						
Shared With EPA Substitute Inspection		A.O. Smith Electrical Products Company			li e	RCRIS Date / By EBB 12/20/00			
☐ IA	☐ IAF 669A NATCHEZ TRACE DR				EBI				
	otlon Status	LEXINGTON	TN 38351	HENDE	RSON		SNC Dete	rmination Done Date / By	
SQG		OGC County (	Code 077 Standar	d County Co					
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